

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION

ULTIMA SERVICES CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	No. 2:20-cv-00041-DCLC-CRW
)	
U.S. DEPARTMENT OF AGRICULTURE,)	
et al.,)	
)	
Defendants.)	

**DEFENDANTS' RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendants the United States Department of Agriculture ("USDA"), the Secretary of Agriculture, Tom Vilsack, the United States Small Business Administration ("SBA"), and its Administrator, Isabella Casillas Guzman (collectively, "defendants") respond to Plaintiff's First Set of Interrogatories as follows:

GENERAL OBJECTIONS

1. Defendants object to plaintiff's interrogatories to the extent they call for the disclosure of any information protected from disclosure by any privilege, statute, or doctrine, including without limitation the attorney-client privilege and attorney work product doctrine. The inadvertent disclosure of such information shall not constitute a waiver of any right of non-disclosure, or the waiver of any other grounds for objecting to the production of such information.
2. Defendants object to plaintiff's interrogatories to the extent they (a) fail to describe the information requested with reasonable particularity; (b) are unreasonably

cumulative or duplicative; (c) seek information obtainable from some other source that is more convenient, less burdensome, or less expensive; (d) seek information that is publicly available; or (e) otherwise exceed the requirements of the Federal Rules of Civil Procedure and/or the local rules of this Court.

3. Some or all of the documents sought in plaintiff's interrogatories contain proprietary, confidential, and/or sensitive business information, information that would violate the privacy rights of defendants or individuals who are not parties to this litigation, or other confidential information and will necessitate the entry of an appropriate protective order prior to their production.

4. Defendants object to plaintiff's interrogatories to the extent they are overly broad, unduly burdensome, and are neither relevant to any claim or defense of any party nor proportional to the needs of the case.

5. Defendants object to plaintiff's interrogatories to the extent they are argumentative, prejudicial, improper, vague, and/or ambiguous.

6. Defendants object to plaintiff's interrogatories to the extent they seek legal conclusions and/or would require defendants to reach a legal conclusion in order to prepare a response.

7. Defendants object to plaintiff's definition of the terms "termination" and "terminate" as including a "decision not to renew an available option period or seek additional funding for available option periods" as such decisions do not constitute termination of a contract.

8. Defendants object to plaintiff's definition of "administrative or technical support" as being limited to the areas of work falling under NAICS codes 561110 or 541611. For purposes of responding to these interrogatories, defendants will interpret

interrogatories related to “administrative or technical support” as requesting information related to those two NAICS codes; however, defendants reserve the right to take the position that the industry or industries relevant to this litigation are not limited to NAICS codes 561110 and 541611.

9. Defendants object to plaintiff’s instruction that the relevant time period is January 1, 2010 to the present as overbroad and unduly burdensome and on the grounds that it seeks information that is not proportional to the needs of the case.

10. Defendants object to any other definition or instruction in Plaintiff’s First Set of Interrogatories that seeks to impose requirements on defendants beyond those contained in the Federal Rules of Civil Procedure or the Local Rules of this Court.

11. Defendants reserve the right to amend and supplement their responses as additional information may become available or is discovered.

12. Each of the answers set forth below is subject to these general objections. A specific response may repeat a general objection for emphasis or some other reason. The failure to include any general objection in any specific response does not waive any general objection to that request.

SPECIFIC OBJECTIONS AND RESPONSES

Interrogatory No. 1: Identify any contracts for administrative or technical support for an NRCS program or activity awarded to a participant in the Section 8(a) Program and, for each such contract, (a) identify the company awarded the contract, (b) state whether it was awarded as a sole source contract, and (c) state whether any owner(s) of the successful Section 8(a) Program participant were presumed to be socially disadvantaged under the Section 8(a) Program pursuant to 13 CFR § 124.103(b), and, if so, of which group(s) those owner(s) were deemed to be members.

Response to Interrogatory No. 1: Defendants object to Interrogatory No. 1 as overbroad and unduly burdensome on the grounds that it seeks information for an over 10-year period. Defendants further object to Interrogatory No. 1 to the extent it

seeks information that is as accessible to plaintiff as it is to defendants, including publicly available information. Defendants also object to Interrogatory No. 1 to the extent it seeks information protected by the government deliberative process privilege, the attorney-client privilege, or the work product doctrine.

Subject to and without waiving the foregoing objections, defendants will produce a spreadsheet entitled “Awards by Contractor Type” which includes the information requested in subparts (a), (b), and (d) of this interrogatory. Defendants represent that they do not track the information requested in subpart (c).

Interrogatory No. 2: Identify any persons significantly responsible for making the decision to award any contract identified in your response to the previous interrogatory.

Response to Interrogatory No. 2: Defendants object to Interrogatory No. 2 as vague and ambiguous, including but not limited to the phrase “significantly responsible.” Defendants further object to Interrogatory No. 2 as overbroad and unduly burdensome on the grounds that it seeks information for an over 10-year period and because defendants do not have a way of tracking every person who was responsible for making a decision to award all such contracts; therefore, identifying this information would require defendants to undertake a burdensome search of every contract file associated with such contracts over 10-year period to determine who was responsible for making the decision to award such contracts. The burden of such a search greatly outweighs any likely benefit. To the extent Interrogatory No. 2 relies on Interrogatory No. 1, defendants incorporate the objections stated in response to Interrogatory No. 1.

Subject to and without waiving the foregoing objections, defendants state that decisions to award a contract, including to a participant in the 8(a) program,

are typically made by a contracting officer. USDA must then seek the acceptance of the proposed award into the 8(a) program from the relevant SBA district office. Pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, defendants will produce documents and/or data from which the response to Interrogatory No. 2 may be ascertained or derived. Specifically, defendants refer plaintiff to the contract files produced in response to Plaintiff's First Request for Production No. 1, which include the identity of any person(s) "significantly responsible" for awarding the contracts defendants identified in response to Interrogatory No. 1. Defendants will also produce a spreadsheet entitled "Interrogatory No. 2," which identifies the most recent contracting officer assigned to each of the contracts identified in response to Interrogatory No. 1.

Interrogatory No. 3: Identify any persons who set any goals for small businesses at the USDA, including goals for any subgroup of all small businesses such as Section 8(a) Program participants, women-owned small businesses, and HUBZone-certified firms.

Response to Interrogatory No. 3: Defendants object to Interrogatory No. 3 as vague and ambiguous to the extent it purports to characterize "goals" as mandatory requirements that USDA must meet. Defendants further object to Interrogatory No. 3 as overbroad and unduly burdensome on the grounds that it seeks information for an over 10-year period. Defendants also object to Interrogatory No. 3 to the extent it seeks information protected by the government deliberative process privilege, the attorney-client privilege, or the work product doctrine.

Subject to and without waiving the foregoing objections, defendants state that federal government-wide goals for small businesses and categories of small businesses are set by Congress. The USDA's individual agency goals are negotiated between the SBA's Office of Government Contracting and Business Development

and the Director of the USDA's Office of Small and Disadvantaged Business Utilization ("OSDBU"). The current Acting Director of the USDA's OSDBU is Michelle Warren, who has held that position since December 2016. Prior to that, Henry Bennett was the Director of OSDBU for a period of 2016. Prior to Mr. Bennett's tenure, Carmen Jones was the Director of OSDBU for the remainder of the relevant time period. If the SBA and the USDA cannot agree on the goals, the Office of Federal Procurement Policy at the Office of Management and Budget will resolve the dispute. The USDA does not have goals specifically for utilization of the 8(a) program; instead the 8(a) program is included within the goal for small disadvantaged businesses.

Interrogatory No. 4: State whether any decision was made to terminate any contract for administrative or technical support for an NRCS program or activity in which Plaintiff was the contractor and, if so, identify any person with significant responsibility for making that decision and set forth the reason(s) for that decision.

Response to Interrogatory No. 4: Defendants object to Interrogatory No. 4 as overbroad and unduly burdensome based on plaintiff's definition of the term "terminate" and on the grounds that it seeks information for an over 10-year period. The request as written would require defendants to comb through every contract file for a contract awarded to plaintiff in a more than 10-year period to determine whether an available option period was not renewed or whether additional funding was not sought for available option periods. Defendants further object to Interrogatory No. 4 as vague and ambiguous, including but not limited to the phrase "significant responsibility." Defendants also object to Interrogatory No. 4 to the extent it seeks information protected by the government deliberative process privilege, the attorney-client privilege, or the work product doctrine.

Subject to and without waiving the foregoing objections, defendants state that the four regional Indefinite Quantity Indefinite Delivery (“IDIQ”) contracts awarded to plaintiff in 2017 for Local and Programmatic Support Services (“LAPSS”) were not terminated. NRCS decided to re-solicit the services that were the subject of those contracts in March 2018 as two of the four contracts were nearing their maximum order value. This decision was made due to challenges associated with the four regional awards, indicated by the early exercising of option years, which caused two of the contracts to prematurely expire monetarily. The challenges associated with the four regional awards indicated that pursuing a regional model for such services was not in the best business interests of NRCS. Specifically, NRCS determined, among other things, that awarding the contracts on a regional basis proved to be more expensive than a state-based model; the regional award model did not allow for the level of customization necessary to ensure that states were getting the services they needed; awarding contracts on a regional basis to one vendor prevented NRCS from utilizing multiple small businesses and thus impeded the agency from meeting its small business utilization goals; and awarding the contracts on a regional basis required a contracting officer to be assigned full time to manage the contracts, thus depleting resources from other critical contracting actions managed by the Contracting Services Branch. As a result of these factors, NRCS re-solicited the services on a state basis. NRCS determined that awarding the contracts on a state rather than a regional or national basis would yield the lowest overall cost to the government; would afford easier access to more localized small business vendors, thus assisting NRCS in meeting USDA’s small business utilization goals; and would reduce the workload of the Contracting

Services Branch, among other things. The reasons for the decision are more fully set forth in the March 2018 Decision Memorandum produced in response to Request No. 2 of Plaintiff's First Requests for Production. Pursuant to Federal Rule 33(d), defendants respond by reference to that document.

Individuals responsible for making this decision include Thomas W. Christensen, Stephen Schaefer, Leonard Jordan, and Heidi Atkinson.

Defendants further state that decisions not to renew an available option period or seek additional funding for available option periods, which plaintiff includes in its definition of terminate, do not actually constitute termination of a contract and are not tracked as such. Documents responsive to this request may be located in the contract files produced in response to Request No. 2 in Defendants' Responses to Plaintiff's First Requests for the Production of Documents. Pursuant to Federal Rule 33(d), defendants respond by reference to those documents.

Interrogatory No. 5: Describe any process by which defendants determine whether the ability of a socially disadvantaged individual (as defined in the Section 8(a) Program) to compete in the free enterprise system has been impaired due to diminished capital and credit opportunities as compared to others in the same business area who are not socially disadvantaged.

Response to Interrogatory No. 5: Defendants object to Interrogatory No. 5 as vague and ambiguous as to the phrase "process by which defendants determine." Defendants interpret this interrogatory as asking how defendants determine whether an applicant to or participant in the 8(a) program meets the definition of "economically disadvantaged" in 15 U.S.C. § 637(a)(6)(A). Defendants further object to Interrogatory No. 5 to the extent it seeks information that is as accessible to plaintiff as it is to defendants, including publicly available information. Defendants also object to Interrogatory No. 5 to the extent it seeks information protected by the

government deliberative process privilege, the attorney-client privilege, or the work product doctrine.

Subject to and without waiving the foregoing objections, defendants state that the SBA determines whether an applicant to or participant in the 8(a) program qualifies as “economically disadvantaged” pursuant to the Small Business Act by examining the factors set forth in 15 U.S.C. § 637(a)(6) and 13 C.F.R. § 124.104.

Interrogatory No. 6: [USDA defendants only] Describe any standard procedure USDA has had since January 1, 2010 for awarding contracts for administrative or technical support services for NRCS programs or activities.

Response to Interrogatory No. 6: Defendants object to Interrogatory No. 6 as overbroad and unduly burdensome in that it seeks information for an over 10-year period. Defendants further object to Interrogatory No. 6 to the extent it seeks information that is as accessible to plaintiff as it is to defendants, including publicly available documents and information.

Subject to and without waiving the foregoing objections, pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, defendants respond by reference to the documents produced and referenced in response to Request No. 11 of Plaintiff's First Requests for Production, from which the response to Interrogatory No. 6 may be ascertained or derived. Defendants further represent that the USDA does not have specific procedures for awarding contracts for administrative or technical support services that differ from its general procedures for awarding contracts.

Interrogatory No. 7: State the number of firms since January 1, 1990 that have been excluded from the Section 8(a) Program – either by having an application denied or by disallowing continued participation -- pursuant to 13 CFR § 124.103(b)(3) despite having one or more owners that was actually a member of, and held himself or herself out as a member of, one of the groups identified in 13 CFR § 124.103(b)(1), met the requirements of ownership and citizenship requirements in 13 CFR § 124.101, and met the qualifications for economic disadvantage in 13 CFR § 124.104.

Response to Interrogatory No. 7: Defendants object to Interrogatory No. 7 because it is overbroad, unduly burdensome, and not proportional to the needs of the case, particularly insofar as it requests information since January 1, 1990—more than thirty years ago. Defendants also object to Interrogatory No. 7 to the extent it seeks information protected by the government deliberative process privilege, the attorney-client privilege, or the work product doctrine.

Subject to and without waiving the foregoing objections, defendants respond that no firm has been excluded from the 8(a) program based on the criteria set forth in plaintiff's request.

Interrogatory No. 8: Set forth the percentage of all participants in the Section 8(a) Program, and the percentage of participants in the Section 8(a) Program who are contractors providing technical and administrative support services, whose owners meeting the requirements of 13 CFR § 124.101 were deemed socially disadvantaged pursuant to the presumption in 13 CFR § 124.103(b)(1).

Response to Interrogatory No. 8: Defendants object to Interrogatory No. 8 as overbroad and unduly burdensome on the grounds that it seeks information for a nine-year period.

Subject to and without waiving the foregoing objections, defendants state that they do not track the information requested in Interrogatory No. 8, but that the documents produced in response to Plaintiff's Request for Production No. 16 may contain some information that is responsive to this request.

Interrogatory No. 9: Set forth the percentage of (1) contracts with the USDA and (2) contracts for administrative and technical support services for NRCS programs and activities that are terminated.

Response to Interrogatory No. 9: Defendants object to Interrogatory No. 9 as overbroad and unduly burdensome and on the grounds that it seeks information not relevant to any party's claim or defense nor proportional to the needs of the case

based on plaintiff's definition of the term "terminated" and insofar as responding to this request would require defendants to examine documents in individual contract files for all contracts with the USDA over a 10-year period. The burden of such a search outweighs any likely benefit.

Subject to and without waiving the foregoing objections, defendants state that they do not maintain statistics concerning the percentage of USDA contracts that are terminated as that term is defined by plaintiff. Pursuant to Federal Rule 33(d), defendants refer plaintiff to the document produced in response to Plaintiff's Request for Production No. 19, which shows the number of contracts terminated for cause, default, or convenience.

Interrogatory No. 10: State whether there is any obligation of a qualifying small business that successfully obtains a contract reserved for small businesses to maintain that status (*i.e.*, of a qualifying small business) throughout the term of the contract or for the exercise of any options under the contract and, if so, identify the requirement.

Response to Interrogatory No. 10: Defendants object to Interrogatory No. 10 to the extent it seeks a legal conclusion. Defendants further object to Interrogatory No. 10 on the grounds that it seeks information that is not relevant to any party's claim or defense.

Subject to and without waiving the foregoing objections, defendants refer plaintiff to 13 C.F.R. § 121.404, which sets forth when the size status of a business concern is determined, including that in certain circumstances a contracting officer may request a size recertification.

Interrogatory No. 11: If any request to admit in Plaintiff's First Request To Admit has been denied in whole or part, explain the basis for such denial.

Response to Interrogatory No. 11: Defendants refer plaintiff to Defendants' Responses to Plaintiff's First Set of Requests to Admit.

Dated: May 28, 2021

OF COUNSEL:

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2021, I served a true and correct copy of Defendants' Responses to Plaintiff's First Set of Interrogatories via email to:

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VERIFICATION FOR RESPONSES TO INTERROGATORIES

I certify under penalty of perjury under the laws of the United States of America that the foregoing response to interrogatory number 9 is true and correct.



Tiffany Taylor
Senior Procurement Executive
U.S. Department of Agriculture

5/28/2021

Date

PIID	Most Recent Contracting Officer	Period of Performance Start Date	Completion Date	Type of Set Aside	Vendor Name	Is Vendor Business Type - 8A Program Participant	Is Vendor Business Type - Minority Owned Business	Is Vendor Business Type - Subcontinent Asian (Asian-Indian) American Owned	Is Vendor Business Type - Asian-Pacific American Owned	Is Vendor Business Type - Black American Owned	Is Vendor Business Type - Hispanic American Owned	Is Vendor Business Type - Native American Owned	Is Vendor Business Type - Other Minority Owned
121A2318F0041	Howard Stover	01/17/2018	09/30/2018	SUBJECT TO MULTIPLE AWARD FAIR OPPORTUNITY	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
121A2318F0061	Amy Smith	02/06/2018	11/30/2018	SUBJECT TO MULTIPLE AWARD FAIR OPPORTUNITY	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
121A2318F0176	Danny Mandell	07/13/2018	09/30/2018	SUBJECT TO MULTIPLE AWARD FAIR OPPORTUNITY	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
121A2318P0184	Julie Simpson	09/27/2018	10/31/2019	8(A) SOLE SOURCE	ALL-PRO PLACEMENT SERVICE, INC.	YES	YES	NO	NO	NO	NO	NO	YES
122B4618C0009	Oriel Velez Olivieri	09/10/2018	09/30/2019	8(A) SOLE SOURCE	ACCOUNTING LEGAL & LOGISTICS SOLUTIONS, INC.	YES	YES	NO	NO	YES	NO	NO	NO
122B4618C0010	Angie Comstock	09/21/2018	09/30/2019	NO SET ASIDE USED.	CHENEGA PROFESSIONAL & TECHNICAL SERVICES, LLC	YES	YES	NO	NO	NO	NO	YES	NO
122B4618C0012	Howard Stover	09/24/2018	09/30/2020	8(A) SOLE SOURCE	CHENEGA PROFESSIONAL & TECHNICAL SERVICES, LLC	YES	YES	NO	NO	NO	NO	YES	NO
123C7818C0008	Julie Simpson	06/25/2018	06/30/2019	8(A) SOLE SOURCE	PBP MANAGEMENT GROUP, INC.	YES	YES	NO	NO	YES	NO	NO	NO
124D9018C0012	Jeremiah Keenan	06/04/2018	06/30/2019	8(A) SOLE SOURCE	POWTEC SOLUTIONS, LLC	YES	YES	NO	NO	NO	NO	YES	NO
124D9018C0017	Ryan Lorimer	09/11/2018	09/30/2019	NO SET ASIDE USED.	POWTEC SOLUTIONS, LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC119P0148	Amy Stonebraker	07/11/2019	07/29/2020	8(A) SOLE SOURCE	WINSAY, INC.	YES	YES	NO	NO	YES	NO	NO	NO
12FPC120A0001	Amy Stonebraker	02/28/2020	02/28/2020		HEARTLAND ENERGY PARTNERS LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC120A0002	Amy Stonebraker	03/06/2020	03/06/2020		GPI ENTERPRISES INC.	YES	YES	NO	NO	NO	YES	NO	NO
12FPC120A0006	Amy Stonebraker	09/03/2020		ECONOMICALLY DISADVANTAGED WOMEN OWNED SMALL BUSINESS	CONNEXUS HUB INC.	YES	YES	NO	YES	NO	NO	NO	NO
12FPC120A0008	Amy Stonebraker	09/24/2020			CHENEGA SYSTEMS, LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC120A0010	Kristina Baker	09/27/2020			FREEDOM INTERNATIONAL INC.	YES	YES	NO	NO	YES	NO	NO	NO
12FPC120A0013	Amy Stonebraker	09/29/2020		ECONOMICALLY DISADVANTAGED WOMEN OWNED SMALL BUSINESS	CLEAR GLOBAL SOLUTIONS LLC	YES	YES	NO	NO	NO	YES	NO	NO
12FPC120C0010	Amy Stonebraker	09/23/2020	09/30/2021	8(A) SOLE SOURCE	HEARTLAND ENERGY PARTNERS LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC120F0158	Amy Stonebraker	03/16/2020	03/05/2021	SMALL BUSINESS SET ASIDE - TOTAL	GPI ENTERPRISES INC.	YES	YES	NO	NO	NO	YES	NO	NO
12FPC120F0162	Amy Stonebraker	03/19/2020	02/28/2021	8(A) SOLE SOURCE	HEARTLAND ENERGY PARTNERS LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC120F0348	Amy Stonebraker	06/25/2020	06/30/2022	8(A) SOLE SOURCE	HEARTLAND ENERGY PARTNERS LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC120F0467	Amy Stonebraker	09/03/2020	09/30/2021	ECONOMICALLY DISADVANTAGED WOMEN OWNED SMALL BUSINESS	CONNEXUS HUB INC.	YES	YES	NO	YES	NO	NO	NO	NO
12FPC120F0488	Amy Stonebraker	09/18/2020	10/01/2021	SMALL BUSINESS SET ASIDE - TOTAL	HEARTLAND ENERGY PARTNERS LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC120F0490	Amy Stonebraker	09/23/2020	09/30/2021	ECONOMICALLY DISADVANTAGED WOMEN OWNED SMALL BUSINESS	CONNEXUS HUB INC.	YES	YES	NO	YES	NO	NO	NO	NO
12FPC120F0494	Julie Simpson	09/25/2020	09/23/2021	NO SET ASIDE USED.	CHENEGA SYSTEMS, LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC120F0505	Amy Stonebraker	09/29/2020	09/26/2025	NO SET ASIDE USED.	FREEDOM INTERNATIONAL INC.	YES	YES	NO	NO	YES	NO	NO	NO
12FPC120F0507	Amy Stonebraker	09/29/2020	09/30/2021	ECONOMICALLY DISADVANTAGED WOMEN OWNED SMALL BUSINESS	CLEAR GLOBAL SOLUTIONS LLC	YES	YES	NO	NO	NO	YES	NO	NO
12FPC120P0083	Amy Stonebraker	04/06/2020	04/12/2021	8(A) SOLE SOURCE	RIVIDUUM INC.	YES	YES	NO	NO	NO	YES	NO	NO
12FPC120P0094	Julie Simpson	04/20/2020	04/30/2021	8(A) SOLE SOURCE	PRACTICAL SOLUTIONS, INC.	YES	YES	NO	NO	NO	NO	NO	YES
12FPC120P0287	Amy Stonebraker	09/30/2020	11/04/2021	8A COMPETED	WITS SOLUTIONS INC.	YES	YES	YES	NO	NO	NO	NO	NO
12FPC121F0009	Philip Reimnitz	11/16/2020	12/15/2020	8(A) SOLE SOURCE	ACCOUNTING LEGAL & LOGISTICS SOLUT	YES	NO	NO	YES	NO	NO	NO	NO
12FPC121F0010	Philip Reimnitz	11/17/2020	12/04/2020	NO SET ASIDE USED.	CHENEGA PROFESSIONAL & TECHNICAL S	YES	NO	NO	YES	NO	NO	NO	NO
12FPC121F0098	Kristina Baker	06/01/2021	09/26/2022	NO SET ASIDE USED. BPA Call	FREEDOM INTERNATIONAL INC.	YES	YES	NO	NO	YES	NO	NO	NO
12FPC121F0130	Julie Simpson	06/30/2021	06/30/2022	NO SET ASIDE USED. BPA Call	MILLENNIUM GROUP INTERNATIONAL, L	YES	YES	NO	NO	YES	NO	NO	NO
12FPC219C0027	Bumjoon Pak	09/27/2019	09/28/2022	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC219P0090	Laureen Eipp	05/15/2019	05/15/2020	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC219P0189	Bumjoon Pak	09/09/2019	09/29/2020	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC219P0203	Nnenna Njoku	09/16/2019	10/01/2020	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO

12FPC219P0232	Nnenna Njoku	09/30/2019	09/29/2020	NO SET ASIDE USED.	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC219P0252	Laureen Eipp	09/30/2019	09/29/2020	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC220F0102	Ryan Lorimer	09/28/2020	09/27/2021	NO SET ASIDE USED.	ATTAINX INC.	YES	YES	YES	NO	NO	NO	NO	NO
12FPC220P0081	Nnenna Njoku	09/30/2020	09/29/2021	NO SET ASIDE USED.	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC319C0003	Julie Simpson	03/20/2019	04/30/2024	8(A) SOLE SOURCE	ACCOUNTING LEGAL & LOGISTICS SOLUTIONS, INC.	YES	YES	NO	NO	YES	NO	NO	NO
12FPC319C0004	Julie Simpson	06/26/2019	09/30/2020	8(A) SOLE SOURCE	ACCOUNTING LEGAL & LOGISTICS SOLUTIONS, INC.	YES	YES	NO	NO	YES	NO	NO	NO
12FPC319C0006	Julie Simpson	07/23/2019	07/31/2020	8(A) SOLE SOURCE	MEC ENERGY SERVICES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC319F0034	Julie Simpson	02/21/2019	02/28/2020	NO SET ASIDE USED.	HEARTLAND ENERGY PARTNERS LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC319P0052	Julie Simpson	02/26/2019	02/29/2020	8(A) SOLE SOURCE	SINEW MANAGEMENT GROUP LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC320C0016	Julie Simpson	10/01/2020	09/30/2021	8(A) SOLE SOURCE	AVALON BUSINESS ENGINEERING SERVICES, LLC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC321F0154	Ryan Lorimer	06/17/2021	06/30/2022	NO SET ASIDE USED. BPA Call	CLEAR GLOBAL SOLUTIONS LLC	YES	YES	NO	NO	NO	YES	NO	NO
12FPC419C0002	Ryan Lorimer	04/25/2019	04/30/2020	8(A) SOLE SOURCE	TIME SYSTEMS LLC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC419C0003	Chanda Sow	04/23/2019	10/31/2019	8(A) SOLE SOURCE	TEYA ENTERPRISES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC419C0007	Ryan Lorimer	06/17/2019	12/31/2019	8(A) SOLE SOURCE	TEYA ENTERPRISES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC419C0008	Ryan Lorimer	09/01/2019	08/31/2020	8(A) SOLE SOURCE	TIME SYSTEMS LLC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC419C0010	Ryan Lorimer	08/22/2019	09/30/2022	8(A) SOLE SOURCE	MEC ENERGY SERVICES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC419C0012	Andrew Fiske	08/22/2019	09/30/2020	8(A) SOLE SOURCE	MEC ENERGY SERVICES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC419C0013	Andrew Fiske	08/23/2019	09/30/2020	NO SET ASIDE USED.	MEC ENERGY SERVICES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC419C0014	Vincent Palmer	08/26/2019	09/09/2020	8(A) SOLE SOURCE	MEC ENERGY SERVICES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC419P0197	Vincent Palmer	09/12/2019	11/29/2019	NO SET ASIDE USED.	BUSINESS DEVELOPMENT ASSOCIATES, LLC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC419P0203	Oriel Velez Olivieri	09/16/2019	09/29/2020	NO SET ASIDE USED.	ENGLISH-EL ENTERPRISES LLC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC420C0001	Ryan Lorimer	12/16/2019	12/31/2020	8(A) SOLE SOURCE	TEYA ENTERPRISES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC420F0012	Ryan Lorimer	12/18/2019	12/17/2020	SMALL BUSINESS SET ASIDE - TOTAL	GPI ENTERPRISES INC.	YES	YES	NO	NO	NO	YES	NO	NO
12FPC420P0118	Ryan Lorimer	09/01/2020	09/09/2021	8(A) SOLE SOURCE	MEC ENERGY SERVICES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC420P0128	Chanda Sow	08/31/2020	08/31/2021	8(A) SOLE SOURCE	AVALON BUSINESS ENGINEERING SERVICES, LLC	YES	YES	NO	NO	YES	NO	NO	NO
12FPC420P0129	Ryan Lorimer	09/04/2020	09/07/2021	8(A) SOLE SOURCE	TEYA ENTERPRISES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC421F0082	Amy Stonebraker	08/09/2021	09/14/2022	NO SET ASIDE USED. BPA Call	CONNEXUS HUB INC.	YES	YES	NO	YES	NO	NO	NO	NO
12FPC421F0088	Amy Stonebraker	08/10/2021	09/23/2022	NO SET ASIDE USED. BPA Call	CHENEGA SYSTEMS, LLC	YES	YES	NO	NO	NO	NO	YES	NO
12FPC421P0023	Amy Stonebraker	04/08/2021	04/30/2022	8(A) SOLE SOURCE	FREEDOM INTERNATIONAL INC.	YES	YES	NO	NO	YES	NO	NO	NO
12FPC421P0110	Amy Stonebraker	08/27/2021	09/30/2022	8(A) SOLE SOURCE	PCI GOVERNMENT SERVICES LLC	YES	YES	NO	NO	NO	NO	YES	NO
12SPEC18F0038	Oriel Velez Olivieri	09/07/2018	09/09/2019	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG1A23C170001	Patricia Sanders	12/21/2016	09/29/2017	8(A) SOLE SOURCE	ABACUS SERVICE CORPORATION	YES	YES	YES	NO	NO	NO	NO	NO
AG1A23C170002	Philip Reimnitz	12/30/2016	12/30/2017	8(A) SOLE SOURCE	CONZINITY GROUP, LLC	YES	YES	NO	NO	YES	NO	NO	NO
AG1A23D160010	Aaron Ramsey	12/23/2015	07/31/2016	NO SET ASIDE USED.	J A M A ENTERPRISES	YES	YES	YES	NO	NO	NO	NO	NO
AG1A23D170159	Gay Mullen-Brown	10/24/2017	01/31/2018	NO SET ASIDE USED.	BUSINESS DEVELOPMENT ASSOCIATES, LLC	YES	YES	NO	NO	YES	NO	NO	NO
AG1A23K161152	Amy Stonebraker	08/24/2016	10/31/2017	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG1A23K161200	Chanda Sow	09/09/2016	10/31/2017	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG1A23K170732	Amy Stonebraker	06/09/2017	10/31/2017	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG1A23K170812	Chanda Sow	07/21/2017	12/31/2017	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG1A23P160174	Amy Stonebraker	09/08/2016	03/14/2017	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
AG1A23P160176	Amy Stonebraker	09/28/2016	04/30/2017	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
AG1A23P170110	Oriel Velez Olivieri	05/15/2017	05/15/2018	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
AG2B46C170016	Shaukat Syed	03/27/2017	06/30/2017	8(A) SOLE SOURCE	CFO LEASING, INC.	YES	NO	NO	NO	YES	NO	NO	NO
AG2B46P170159	Nancy Harris	09/12/2017	09/30/2018	8(A) SOLE SOURCE	LEWIS-PRICE & ASSOCIATES INC	YES	YES	NO	NO	YES	NO	NO	NO
AG3A75B150001	Linda Dyson	04/01/2015	03/31/2020	NO SET ASIDE USED.	HUMAN RESOURCES CONSULTING, INCORPORATED	YES	NO	NO	NO	YES	NO	NO	NO
AG3A75P150007	Marian Jones-Millwood	01/30/2015	12/31/2015	8(A) SOLE SOURCE	FOUR LLC	YES	YES	NO	NO	NO	NO	NO	YES
AG3C78D160188	Ryan Lorimer	09/06/2016	12/31/2016	8A COMPETED	TASK SOURCE INC.	YES	YES	NO	NO	NO	NO	YES	NO
AG3D47P150012	Vicki Supler	09/10/2015	09/09/2016	8(A) SOLE SOURCE	ARK TEMPORARY STAFFING LLC	YES	YES	NO	NO	YES	NO	NO	NO

AG4310K150007	Amy Stonebraker	09/29/2015	09/30/2016	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG4310P150016	Denise Brooks	08/20/2015	02/29/2016	8(A) SOLE SOURCE	CREATIVE BUSINESS SOLUTIONS, INC.	YES	YES	NO	NO	YES	NO	NO	NO
AG4D90C170027	Philip Reimnitz	09/26/2017	09/30/2022	8(A) SOLE SOURCE	AGILE TRANSFORMATION, INC.	YES	YES	NO	NO	YES	NO	NO	NO
AG4D90K160031	Howard Stover	03/10/2016	03/31/2017	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG4D90K160032	Howard Stover	03/10/2016	03/31/2017	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG4D90P170084	Howard Stover	03/24/2017	12/31/2017	NO SET ASIDE USED.	POWTEC SOLUTIONS, LLC	YES	YES	NO	NO	NO	NO	YES	NO
AG7103K150015	Shaukat Syed	09/11/2015	09/30/2016	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG9104K150007	Dale Clark	02/17/2015	08/14/2015	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO
AG9104K150008	Dale Clark	04/17/2015	12/31/2015	SMALL BUSINESS SET ASIDE - TOTAL	PANUM TELECOM LLC	YES	YES	YES	NO	NO	NO	NO	NO

VERIFICATION FOR RESPONSES TO INTERROGATORIES

I certify under penalty of perjury under the laws of the United States of America that the foregoing responses to interrogatory numbers 1, 2, 3, 4, 6, and 10 are true and correct.

Sheryl Welch
Contract Specialist
U.S. Department of Agriculture

Date 06/18/2021

VERIFICATION FOR RESPONSES TO INTERROGATORIES

I certify under penalty of perjury under the laws of the United States of America that the foregoing responses to interrogatory numbers 5, 7, and 8 are true and correct.



Donna Peebles
Associate Administrator for 8(a) Business Development
U.S. Department of Agriculture

June 1, 2021

Date